DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service

National Institutes of Health
National Institute of
Environmental Health Sciences
NTP Interagency Center for the Evaluation
of Alternative Toxicological Methods
P. O. Box 12233
Research Triangle Park, NC 27709
http://iccvam.niehs.nih.gov

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TO: Scientific Advisory Committee on Alternative Toxicological Methods (SACATM)

FROM: Director, NTP Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM)

SUBJECT: Preliminary Estimation of the Under-prediction Rate for the *In Vivo* Rabbit Ocular Irritation Assay

At the October 20 SACATM meeting, Dr. Joe Haseman and I will present the results of an preliminary analysis conducted by NICEATM to estimate the likelihood of underpredicting severe and/or irreversible ocular irritation or corrosivity when using the current sequential 1-3 animal test method. The analysis is based on classification according to the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS) (UN, 2003) categories. The GHS is expected to be implemented globally during the next few years.

At this time we are providing the databases used for the analysis. The detailed analysis is in the final stages and will be forwarded to you at least one week prior to the meeting. The first database consists of 132 substances tested in 149 *in vivo* studies from ECETOC Technical Report No. 48 (2): Eye Irritation Reference Chemicals Data Bank (Second Edition) (ECETOC, 1998). The second database analyzed was a combination of the ECETOC database and data obtained in response to a *Federal Register* request (Vol. 69, No. 57, pp. 13589-13561, March 24, 2004) for *in vitro* and *in vivo* ocular irritation data. This database contains a total of 464 studies from the following sources:

Data Source	Total Studies
Access Business Group	9
Cosmetics Toiletry and Fragrance Association	54
European Centre for Ecotoxicology and Toxicology of Chemicals	143
Food and Drug Administration	156
European Isocyanate & Polyol Producers Association	8
Toxic Substances Control Act Database	36
Japan National Institute of Health	58
Totals	464

The total database of 464 studies is attached and provides the response of each individual animal and the overall GHS ocular hazard classification for each study. The rules used to classify the individual animal responses and each study according to the GHS are also attached.

Additional information about the current review of *in vitro* ocular toxicity test methods can be found at the ICCVAM and NICEATM web site: http://www.iccvam.niehs.nih.gov.

We look forward to your comments and suggestions at the upcoming meeting.

William S. Stokes, D.V.M., Diplomate, ACLAM

Attachments